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To: Texas PUC Commissioners and staff

From Tom "Smitty" Smith

Former director of Public Citizen's Texas office

Re: Some suggestions on winterization policy in docket 51840

Dear Commissioners:

I have two suggestions for modifications to your winterization policy that you asked staff develop on August 12th.

- Ask the generators to certify that their fuel supplies are prepared for the winter storm standards. If there is no natural gas produced in an emergency, any investment in new gas-fired generation is just a pile of useless metal sitting there while Texans freeze. The same is true if the coal piles freeze.
- Winterize to the 1983 and 1989 storms that Jon Nielson Gammon, the State's Climatologist-suggested should be used as the storm of reference, rather than the 2011 standard.

Although I am "retired" I remain deeply engrossed in the ongoing debate over how to prevent the next blackout or power shortages due to weather.

I was lucky enough to have had electricity during URI and so I read every FERC and NERC report on previous weather-related blackout I could find online. Each of those reports noted that freezing of the natural gas production facilities and coal piles were partial causes of the disruption.

The RRC and the PUC have both been charged with developing winterization standards – and while you have begun the process, the RRC Commissioners have not and continue to deny that freezing natural gas wellheads and pipelines were part of the problem. This is not new, while the PUC adopted weatherization standards after the 2011 and subsequent storms, the RRC did not, although the every FERC/NERC report recommended they do so.

Asking generators to "attest" that their suppliers are winterized is a simple solution to this ongoing problem and in your power.

I was encouraged that you invited the experts to talk to you about past and future weather at your hearing. The State's climatologist noted the 1983 and 1989 storms should be used as the storm of reference (see video from minutes 38- 46). As Commissioner McAdams pointed out his charts on page 14-16 show the lowest winter temperature in Abilene at the 50%, 95%, 98% and 99% level (see below). These correspond nicely with the proposed rules. I would urge you to make these the storms of record and require generators to winterize their facilities to those standards. Generators need a clear guideline of what the weatherization goals are. The multi-dimensional multi-probability approach the Commission proposed is unworkable because there is no clarity as to what the actual target will be. And, as you recognize, we need to take regional differences into account. Similar data should be available in each region of the state. Weatherizing a generator in Houston to run in Abilene weather is a path to failure. It may not be possible to weatherize to these standards immediately, but it may save the generators labor and materials if they know what the eventual weatherization standard will be.

Thanks for your commitment to getting this right. I'll be happy to assist in any way I can.

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